

From: Ohl, Matthew ohl.matthew@epa.gov
Subject: Follow-up Request for ERH at Third Site DNAPL Area

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To: Julie Konzuk JKonzuk@Geosyntec.com, Andrew A Gremos agremos@ramboll.com, Esq. Norm Bernstein
nwbernstein@nwblc.com, Peter Racher pracher@psrb.com

Cc: Krueger, Thomas krueger.thomas@epa.gov, DPetroff DPetroff@idem.IN.gov

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Good morning all,

Thank you for the additional information on bioremediation and the discussions we have had of site-specific conditions and the proposals the Trustees are considering. After consulting with the U.S. Army Corps of Engineers and IDEM, EPA believes further ERH treatment is the most likely approach to quickly and effectively achieve the cleanup standards. We continue to recommend and request additional ERH treatment for the DNAPL area as provided by the Amended Enforcement Action Memorandum of December 12, 2016. It appears that in locations that were fully and successfully heated, effective treatment was achieved. EPA suggests adding treatment points with an emphasis on addressing the remaining contaminated areas.

Treating these areas using thermal remediation will likely entail completely delineating the depth of this contamination, and installing additional electrodes and extraction wells fully enveloping the defined treatment area. A preliminary estimate is that an additional 20 electrodes and seven extraction wells installed to approximately 55 feet below ground surface (BGS) would be adequate to address the additional sub-40-foot BGS contamination observed in post-remediation sampling. It is noted that the existing aboveground equipment is more than adequately sized to handle the additional loads imposed by the likely treatment volume increase, and thus this equipment could be reused. However, given the time that the equipment has been left on-site, we expect four to six weeks of repair time will be needed before operation.

Please provide a work plan for additional ERH treatment by December 1, 2021.

Sincerely,
Matt

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442

fax: 312.692.2447

e-mail: ohl.matthew@epa.gov